

Exhibit 1

From: Raghavan, Rajeev (USAMD) <Rajeev.Raghavan@usdoj.gov>
Sent: Monday, March 9, 2020 6:39 PM
To: Bradford, Michelle <MBradford@btlaw.com>
Cc: Martin, Billy <Billy.Martin@btlaw.com>; Pulice, Erin (USAMD) <Erin.Pulice@usdoj.gov>
Subject: [EXTERNAL]RE: Tactical Gear Heads Subpoena

Ms. Bradford,

We appreciate the clarification. The Government does not intend to withdraw its trial subpoena. Thank you.

-Rajeev R.

From: Bradford, Michelle <MBradford@btlaw.com>
Sent: Monday, March 09, 2020 3:31 PM
To: Raghavan, Rajeev (USAMD) <RRaghavan@usa.doj.gov>
Cc: Martin, Billy <Billy.Martin@btlaw.com>
Subject: RE: Tactical Gear Heads Subpoena

Mr. Raghavan – my apologies for the delayed response. I actually need to correct my earlier statement; TGH first sold a Polymer80 kit to a Maryland resident on July 30, 2018, which was shipped 8/2/18. These dates post-date the offense date in the underlying case.

I am preparing to file a motion to quash within the next day or two, so please let me know if this information changes your view of the subpoena.

Thank you,

Michelle Bradford

Direct (202) 408-6922



From: Raghavan, Rajeev (USAMD) <Rajeev.Raghavan@usdoj.gov>
Sent: Thursday, March 5, 2020 2:09 PM
To: Bradford, Michelle <MBradford@btlaw.com>
Cc: Martin, Billy <Billy.Martin@btlaw.com>; Pulice, Erin (USAMD) <Erin.Pulice@usdoj.gov>
Subject: [EXTERNAL]RE: Tactical Gear Heads Subpoena

Ms. Bradford,

Thank you for your email, and I apologize but I did not receive your message last week.

Can you please let me know the period in 2019 during which TGH sold firearm kits in Maryland? I can provide you a response based on that.

Thank you.

-Rajeev R.

From: Bradford, Michelle <MBradford@btlaw.com>
Sent: Thursday, March 05, 2020 12:55 PM
To: Raghavan, Rajeev (USAMD) <RRaghavan@usa.doj.gov>
Cc: Martin, Billy <Billy.Martin@btlaw.com>
Subject: Tactical Gear Heads Subpoena

Good Afternoon Mr. Raghavan – My firm has been retained to file a motion to quash the subpoena to Tactical Gear Heads. I called and left a message last week but have not heard back from you. I wanted to share with you the fact that TGH did not sell any firearm kits in the state of Maryland until 2019. Please let me know if that changes your view of the subpoena or if you want to discuss the issue further prior to my filing.

Thanks,

Michelle Bradford | Partner

Barnes & Thornburg LLP

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